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### **REMARKS**

Claims 2, 4-13, 15, 17-26, 28, 30-39, and 41-44 were presented for examination. The final Office Action dated September 9, 2005 rejects all of these claims. This paper requests reconsideration of the claims for the reasons presented below. Claims 2, 4-13, 15, 17-26, 28, 30-39, and 41-44 remain pending in the application.

#### **Rejection under 35 U.S.C. 103(a)**

The final Office Action rejects claims 2, 4, 5, 7-10, 12, 15, 17, 18, 20-23, 25, 28, 30, 31, 33-36, 38, and 41-44 under 35 U.S.C. 103(a) as being unpatentable over Bertin (U.S. Patent No. 5,678,167), in view of Schneider (U.S. Patent No. 6,785,728). Applicants respectfully traverse this rejection because Bertin and Schneider, whether taken alone or in combination, do not disclose, teach, or suggest every element and limitation of the Applicants' invention as now claimed

In pertinent part, the Applicant's invention implements a filter that limits access to a resource to a first network device, identifies a second network device that wants access to the resource, and then modifies the filter so that any network device associated with a network address within a range of network addresses – defined by the network addresses of the first and second network devices – can access the resource. Thus, the Applicant's invention is a

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automatic process of aggregating filters: before the modification a single filter operates to limit access to a first network device, but after the modification, the same single filter operates to grant access to the resource by a plurality of network devices (i.e., at least the first and second network devices).

Accordingly, the Applicant's invention offers a mechanism for increasing the number of users (or applications) that can reserve a resource on a given network device, particularly those network devices that limit the number of filters that may be installed on that network device.

Bertin teaches a method for bandwidth reservation, in which an access node, in response to a connection request from a source user, sends a Bandwidth Request message to each transit node along a chosen path in an attempt to reserve bandwidth on each link of the path. The Bandwidth Request specifies the requested capacity. Each transit node determines if there is sufficient capacity to grant the request and replies to the access node with the amount of capacity granted for the requested connection. (Col. 13, lines 20-40).

If, as the Office Action asserts in paragraph 3 on page 3, a bandwidth reservation equates to the installation of a filter, then Bertin would teach installing a filter for each source user sending a connection request to the access node. It follows, then, that if two source users need to reserve

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bandwidth, then Bertin would install two filters at each transit node, one for each source user sending a connection request. Therefore, Bertin would require a multiplicity of filters to support connection requests from multiple source users. Bertin would thus encounter the very problem that the Applicant's invention aims to mitigate, namely, a limit on the number of filters that can be installed on a given network device, because Bertin does not aggregate filters, as set forth in the Applicant's claimed invention.

Moreover, unlike the Applicant's invention, Bertin's "filters" are not based on the network address of the requesting source user. Rather, Bertin's filters operate to grant or deny access based on whether there is sufficient capacity currently available to support the requesting source user. Therefore, not only does Bertin not use a filter that limits access based on a network address of a network device, but Bertin also does not modify the filter so that the filter grants access to any network device associated with a network address within the identified range of network addresses. The Office Action acknowledges as much by stating, on page 4, that "Bertin does not explicitly show modifying the network access instructions by allowing access to the resource to any device having an address within an identified range based on the network addresses associated with first and second network [devices]."

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Schneider, on the other hand, discloses an access filter that allows a user to access a resource by determining whether the IP address of that user is within a range of IP addresses (i.e., the user belongs to a user group).

However, the Applicant's invention is more than just a filter that grants access to multiple devices within a range of addresses – the Applicant's invention is an automated aggregation process in which a filter that previously limited access to a single network device changes into a filter that grants access to multiple devices. Modifying Bertin to use Schneider's user groups (i.e., ranges of IP addresses) may be able reduce the number of filters required in a network, but this combination still lacks the automated aggregating feature of the Applicant's claimed invention, namely, the steps or means by which a filter that previously limited access to a single network device changes into a filter that grants access to multiple devices.

Moreover, there is no suggestion or motivation to modify Bertin's bandwidth reservation to employ Schneider's user groups. While Bertin's bandwidth reservation system may be prone to multiplying the number of access filters, and that Schneider's use of user groups may be able to reduce the amount of access filters required in the network, Schneider's technique is an inappropriate solution in Bertin's system. Modifying Bertin so that now Bertin grants or denies access to a resource based on the network address of the requesting source user changes the very basis upon which Bertin makes

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the decision. As mentioned above, Bertin's bandwidth reservation system bases permission or denial upon whether there is sufficient capacity to support the requesting source user. Because this proposed modification changes Bertin's principle of operation, there can be no suggestion or motivation to make such a modification. Therefore, Applicant respectfully requests that the rejection be withdrawn.

Independent claims 42-44 recite language similar to the language recited in claim 41. Therefore, these independent claims are also patentably distinguishable over Bertin for at least those reasons provided in connection with claim 41. In addition, dependent claims 2, 4, 5, 7-10, 15, 17, 18, 20-23, 25, 28, 30, 31, 33-36, and 38 depend directly or indirectly from patentable independents claim 41-43, and incorporate all of their respective limitations, and therefore are also patentably distinguishable over the cited references for at least this reason. Therefore, the Applicant respectfully submits that the rejection against these claims is also overcome.

**Rejection of Claims 6, 13, 19, 26, 32, and 39 under 35 U.S.C. 103(a)**

The Office Action rejects claims 6, 13, 19, 26, 32, and 39 under 35 U.S.C. 103(a) as being unpatentable over Bertin in view of Schneider, and further in view of Hegde (U.S. Patent No. 6,570,875). Dependent claims 6, 13, 19, 26, 32, and 39 depend directly or indirectly from patentable independent

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claim 41-43, and incorporate all of its respective limitations, and therefore are also patentably distinguishable over the cited references for at least this reason. Therefore, the Applicant respectfully submits that the rejection against these claims is also overcome.

**Rejection of Claims 11, 24, and 37 under 35 U.S.C. 103(a)**

The Office Action rejects claims 11, 24, and 37 under 35 U.S.C. 103(a) as being unpatentable over Bertin in view of Schneider, and further in view of Ellesson (U.S. Patent No. 6,459, 682). Dependent claims 11, 24, and 37 depend directly or indirectly from patentable independent claims 41-43, and incorporate all of their respective limitations, and therefore are also patentably distinguishable over the cited references for at least this reason. Therefore, the Applicant respectfully submits that the rejection against these claims is also overcome.

**CONCLUSION**

In view of the arguments made herein, Applicant submits that the application is in condition for allowance and requests early favorable action by the Examiner.

If the Examiner believes that a telephone conversation with the Applicant's representative would expedite allowance of this application, the Examiner is cordially invited to call the undersigned at (508) 303-2003.

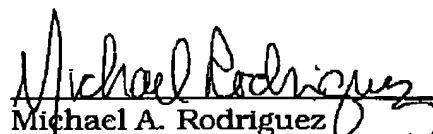
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Respectfully submitted,

Date: 11/9/05  
Reg. No. 41,274

Fax No.: (508) 303-0005  
Tel. No.: (508) 303-2003

  
Michael A. Rodriguez  
Attorney for Applicant  
Guerin & Rodriguez, LLP  
5 Mount Royal Avenue  
Marlborough, MA 01752